

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau E

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August 29, 2016

VIA E-MAIL

Mr. Lorenzo Thantu
Emergency and Remedial Response Division
United States Environmental
Protection Agency – Region II
290 Broadway – 20th Floor
New York, New York 10007

RE: Li Tungsten, Site No. HW130046
City of Glen Cove, Nassau County
Remedial Action Work Plan

Dear Mr. Thantu:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with the New York State Department of Health (NYSDOH), has reviewed the Draft Li Tungsten Remedial Action Work Plan and has the following comments.

1. Title Page: Please replace the outdated NYSDEC symbol with the updated NYSDEC emblem.
2. Section 1.3: Please include a figure with sample locations and contamination noted.
3. Section 3.9 Paragraph 5: Please state the sampling frequency in addition to referencing DER-10. Please note that if contamination is noted at multiple depths within an excavation area, each zone of contamination's sidewalls will be sampled in accordance with DER-10 (i.e., if contamination is found at 2-4 feet (ft) below ground surface (bgs) and 8-10 ft bgs, sidewall samples will be collected from the 2-4 ft bgs interval and 8-10 ft bgs interval at the frequency required by DER-10).
4. Section 3.9 Paragraph 5: Please note "the exceedance of protection of groundwater concentrations pertains to any current or future storm water retention basins or infiltration structures." The Remedial Action Plan must take into consideration future use of the site. Please see comment 19 below with regards to denoting future structures on site.



Department of
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5. Section 3.9 Paragraph 6: Prior to backfilling the area of excavation the area will be surveyed including locations of final confirmation samples.
6. Section 3.9 Paragraph 7: All trucks hauling excavated material from site will be water tight.
7. Section 3.10 Paragraph 1: If contamination is noted in multiple depths within an excavation area, each zone of contamination's sidewalls will be sampled in accordance with DER-10.
8. Section 3.11 Paragraph 2: Please see Comment 6.
9. Section 3.11: A truck wash station will be used for all trucks that have entered into the zone of contamination.
10. Section 3.13: Backfill meeting the requirements of the Record of Decision but exceeding unrestricted use can only be used if placed beneath a cover as outlined in the Record of Decision. The cover system shall be placed within the same construction season.
11. Section 3.13 Paragraph 4: Excavated soil not suitable for backfill will be disposed appropriately offsite.
12. Section 3.15 Paragraph 1. Please see Comment 7.
13. Section 3.15 Paragraph 1: Backfill shall meet the requirements of Record of Decision. A request for Beneficial Use Material shall be submitted separate from the Remedial Action Work Plan.
14. Section 3.15 Paragraph 1: All backfill will be tested in accordance to DER-10 Table 5.4(e)10.
15. Section 3.15.1 Paragraph 2: Recycled Concrete Aggregate use will be subject to NYSDEC approval of source.
16. Appendix C, CAMP: Please clarify why hydromulch will be used for vapor suppression instead of the traditional vapor suppressant foam. I understand that hydromulch is commonly used as landfill daily cover but I am not sure if it will be effective against the types of odors/vapors which may be encountered during remedy implementation at this site.
17. General: Please revise to include a section on surveying of excavations, confirmation sample locations, and cover system.
18. Drawing 1 and 2: Please outline the site as indicated in the Record of Decision to maintain consistency.

Mr. Lorenzo Thantu

Page 3

19. Revised Drawing 3: Please include a note indicating that storm drain end points shown anticipate relocation of the bulkhead for the proposed marina.

Please contact me with any questions, comments or concerns regarding this matter at heidi.dudek@dec.ny.gov or 518-402-9813.

Sincerely,



Heide-Marie Dudek, P.E.
Project Manager
Remedial Section A, Remedial Bureau E
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